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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

NORMAJEAN DENNO;	)	Case No.: 2:20-CV-01155-TLN-JDP
	)	
Plaintiffs,	)	<b>STIPULATION RE DISCOVERY CUT-</b>
	)	<b>OFF DATES &amp; FUTURE PROCEEDINGS</b>
v.	)	
	)	
UNITED STATES OF AMERICA;	)	
and DOES 1-20,	)	
	)	
Defendants.	)	
	)	
	)	
	)	
	)	

IT IS HEREBY STIPULATED by and between the Parties, through their respective counsel of record, that the following current discovery cut-off dates and future proceedings of

- (1) **Fact Discovery:** August 18, 2021;
- (2) **Expert Disclosures:** October 18, 2021;
- (3) **Expert Discovery:** December 17, 2021;
- (4) **Law and Motion:** February 14, 2022;

The parties stipulate that all deadlines be continued six months, with the new dates being:

- (1) **Fact Discovery:** February 18, 2022;
- (2) **Expert Disclosures:** April 18, 2022;

(3) **Expert Discovery:** June 17, 2022;

(4) **Law and Motion:** August 15, 2022;

(5) **Scheduling of pretrial and trial:** The parties propose that any modifications to standard pretrial or trial proceedings be requested by September 14, 2022.

Good cause exists for this extension as discovery in this case involves numerous depositions, and discovery has been delayed due to the ongoing pandemic. Defaulted Defendant Isaac Cannady was the driver of the boat and the only eyewitness. He has been extraordinarily difficult to locate to take his deposition and it appears he may be attempting to avoid subpoena.

This is the first request for a discovery cut-off extension or extension of any dates.

IT IS SO STIPULATED.

DATED: July 6, 2021

ABBEY, WEITZENBERG, WARREN & EMERY

By: /s/Brian G. Lance  
Michael D. Green  
Brian G. Lance  
Attorneys for Plaintiff

DATED: July 6, 2021

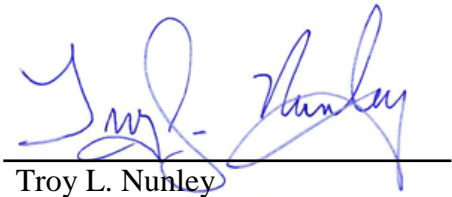
DAVID SHELEDY  
Assistant United States Attorney  
Chief, Civil Division  
R. MICHAEL UNDERHILL  
Attorney in Charge, West Coast Office  
Torts Branch, Civil Division

By /s/ Vickey L. Quinn  
VICKEY L. QUINN  
Trial Attorney  
West Coast Office  
Torts Branch, Civil Division  
U.S. Department of Justice  
Attorneys for Defendant  
United States of America

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IT IS SO ORDERED.

DATED: July 7, 2021

  
Troy L. Nunley  
United States District Judge